

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DONNA POPLAR,

Plaintiff,

v

CASE NO: 2:21-cv-12568-VAR-JJCG

HON. VICTORIA A. ROBERTS

GENESEE COUNTY ROAD
COMMISSION and FRED F. PEIVANDI, in
his individual Capacity,

Defendants.

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INDEX OF EXHIBITS AND OTHER DOCUMENTS

Defendant Genesee County Road Commission and Defendant Fred Peivandi submit the following Index of Exhibits and Other Documents, which is intended to accompany their

Motion for Summary Judgment in the above-captioned case.

Index of Exhibits

1. C. Lange Investigation Report
2. D. Poplar 02/04/2019 EEOC Charge
3. D. Poplar 05/10/2021 EEOC Charge
4. D. Poplar 01/28/2021 Internal Complaint to GCRC Board
5. D. Poplar 08/26/2021 Internal Complaint to GCRC Board
6. July 23, 2018 GCRC Board Meeting Minutes
7. D. Poplar Resume
8. *Joubran v. County of Genesee*
9. *Shriner v. The Herald Co.* Opinion
10. *Poplar v. City of Flint* Opinion
11. D. Poplar – October 2016 Employment Agreement
12. D. Poplar – February 2017 Employment Agreement
13. HR Administrative Assistant Budget Request and Needs Analysis
14. D. Poplar – December 2017 Employment Agreement
15. *Branch v. Genesee County Road Commission* Opinion
16. May 15, 2018 GCRC Board Meeting Minutes
17. August 27, 2018 Email – Poplar Accommodation Request
18. August 29, 2018 Letter – Peivandi Accommodation Inquiry

19. Poplar / Peivandi Secret Recording Transcript
20. December 6, 2018 Email – Administrative Assistant Wage Discussion
21. Administrative Assistant Budget Transfer Request
22. January 8, 2019 GCRC Board Meeting Minutes
23. January 31, 2019 Email – Poplar to Board re Wage Rate
24. June 27, 2019 Email – Peivandi to Poplar re Full Time
25. August 12, 2019 Email – Poplar to Peivandi re Full Time Denial
26. August 23, 2019 Email – Poplar to Mandelaris re Full Time Position
27. *Branch v. Genesee County* Complaint
28. February 9, 2021 GCRC Board Meeting Minutes
29. May 18, 2021 GCRC Board Meeting Minutes
30. C. Lange Investigation Summary Letter
31. 7/1/21 Directives to Poplar
32. August 16, 2021 Email – Poplar to Peivandi re COVID-19
33. August 17, 2021 COVID-19 Memorandum
34. August 19, 2021 Disciplinary Action Notice – Suspension
35. September 6, 2021 Notice of Administrative Leave
36. September 28, 2021 Letter – Poplar’s Attorney to Board
37. October 6, 2021 GCRC Board Meeting Minutes
38. November 2, 2021 GCRC Board Meeting Minutes

39. August 5, 2021 Right to Sue Notice (re Second EEOC Charge)

40. 2023 Fiscal Year Budget

41. Human Resources Director Job Description

Index of Other Documents

- A. Statement of Material Facts
- B. 07/14/22 Deposition Transcript – Fred Peivandi
- C. 09/22/20 Deposition Transcript – Donna Poplar
- D. 07/19/22 Deposition Transcript – John Mandelaris
- E. 07/14/22 Deposition Transcript – Randy Dellaposta
- F. 06/10/22 Deposition Transcript – Donna Poplar
- G. 06/12/15 Deposition Transcript – Donna Poplar
- H. 09/23/22 Deposition Transcript – John Daly
- I. 07/21/20 Deposition Transcript – Anthony Branch
- J. 07/22/20 Deposition Transcript – John Daly
- K. 07/21/22 Deposition Transcript – Cloyce Dickerson
- L. 09/16/22 Deposition Transcript – Monica Pearson

Dated: November 21, 2022

/s/ Andrew A. Cascini

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